



SHREWSBURY ELECTRIC AND CABLE OPERATIONS

YOUR COMMUNITY PROVIDED ELECTRIC & CABLE SERVICES

Received & Inspected

February 12, 2015

FEB 18 2015

Via Federal Express

FCC Mail Room

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW Suite TW-A325
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

RE: CPNI Certification Compliance, EB Docket No. 06-36, for
Shrewsbury Electric and Cable Operations

Dear Ms. Dortch:

Shrewsbury Electric and Cable Operations (SELCO), a municipally owned interconnected VoIP Service Provider serving the Town of Shrewsbury, Massachusetts, and pursuant to Section 64.2009(e) of the Commission's Rules, hereby submits its CPNI certification and accompanying statement.

Should you have any questions or require additional information, please contact the undersigned.

Sincerely,

Jackie Pratt
Marketing and Customer Care Manager

cc: Telecommunications Consumers Division, Enforcement Bureau

Attachment

No. of Copies rec'd 0
List ABCDE

FEB 18 2015

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

FCC Mail Room

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2015 covering the prior calendar year 2014.

1. Date filed: February 11, 2015
2. Name of company(s) covered by this certification: Shrewsbury Electric and Cable Operations (SELCO)
3. Form 499 Filer ID: 826045
4. Name of signatory: Michael R. Hale
5. Title of signatory: General Manager
6. Certification:

I, Michael R. Hale, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed


Michael R. Hale

EXHIBIT A

CUSTOMER PROPRIETARY NETWORK INFORMATION RULES AND POLICIES

The following rules and policies describe Shrewsbury Electric and Cable Operation's operating procedures for maintaining a comprehensive customer proprietary network information ("CPNI") program to protect the privacy of our customers pursuant to Section 222 of the Communications Act of 1934, as amended, 47 U.S.C. § 222, and the FCC's rule 47 C.F.R. § 64.2009(e). These procedures prohibit the sale of telephone call records or the marketing use of such information. The use of customer data for external or internal sales initiatives is prohibited and a disciplinary process is in place to handle any violation of this policy.

"CPNI" is defined as "(A) information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and (B) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier."

I. SCOPE

A. Prohibition on Use of CPNI in Marketing

To ensure the protection of the privacy of customer information by prohibiting the unauthorized release of CPNI and to prohibit the external or internal sale of telephone call records. Under no circumstances shall the customer databases associated with SELCO's telephone system be utilized for marketing activities.

B. Policies With Respect to Customer Access (protections against pretexting)

- SELCO shall not release CPNI to customers during customer-initiated telephone contact except when the customer provides a password.
 - a) If a customer does not provide a password, SELCO may release call detail information by sending it to an address of record or,
 - b) by calling the customer at the telephone of record.
- SELCO shall provide mandatory password protection for online account access.
- SELCO may provide CPNI to customers based on in-store contact with a valid photo ID.

- SELCO shall notify the customer immediately when a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed.

II. COMPLIANCE OFFICER

Jackie Pratt, SELCO Marketing and Customer Care Manager, has been appointed as the CPNI Compliance Officer, and can be reached at 508-841-8314 or jpratt@shrewsburyma.gov. All requests for CPNI data shall be referred to the CPNI Compliance Officer.

III. PROCEDURES

Upon receipt of a third-party request for customer call records or other CPNI data that is not initiated by the customer with verified password information:

- The employee receiving the request shall notify the Compliance Officer.
- The Compliance Officer shall log the request with approved/denied status.
- Only requests associated with a legal court order shall be approved/released. An accompanying letter must indicate that released information will not be used for marketing activities.
- Failure to follow the above procedure shall result in disciplinary action.

IV. REQUIREMENTS UPON DISCOVERY OF UNAUTHORIZED DISCLOSURE

The following process shall be followed upon discovery that unauthorized disclosure of CPNI, in any form, has occurred.

- The Compliance Officer shall notify the FCC's Enforcement Bureau, Telecommunications Consumers Division by telephone within 24 hours of such discovery.
- The Compliance Officer shall notify the effected customers by telephone as soon possible, but no later than 24 hours after such discovery.
- The Compliance Officer shall notify local law enforcement within 24 hours of discovery of unauthorized access to CPNI.
- The Compliance Officer shall provide written notice to the FCC's Enforcement Bureau Telecommunications Consumers Division, 445 12th Street, S.W., Washington, D.C. 20554, no later than 7 days after such discovery.

V. TRAINING

All Customer Service, Sales, and Marketing employees shall receive CPNI training on annual basis.

VI. RECORD KEEPING

A written record of all requests for, and complaints regarding, CPNI shall be maintained for a minimum of one year. An Officer of SELCO shall provide a compliance certificate to the FCC by March 1 of each year documenting compliancy with this program and records of requests or complaints, as well as information with respect to proceedings against data brokers and pretexters.

MEMO FOR FILE

FEBRUARY 11, 2014

ROBIN KING

FCC CPNI COMPLIANCE TRAINING SESSION

Procedural changes designed to ensure compliance with the requirements of the *Report and Order and Further Notice of Proposed Rulemaking, Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information*, CC Docket 96-115 (FCC 07-22) was covered with the SELCO CSR and Collections Team.

Attendees:

R. King *RK*
~~T. Dorie~~ *maternity leave*
L. White *LW*
M. Flynn *MF*
P. Hannaford *PH*
C. Beland *CB*
S. Cappucci *SC*



B:\Regulatory,
Taxes, Fees\Federal\



WC_CPNI.ppt



X:\SELCO Telephone
Forms & Documents\f

FCC Customer Proprietary Network Information ("CPNI") Rules

Effective February 8, 2008

SYNOPSIS

CPNI is defined as "(A) information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and (B) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier. [Call Detail Records]"

- 1) SELCO is prohibited from releasing call detail information to customers during customer-initiated telephone contact except when the customer provides a password.
 - a) If a customer does not provide a password, SELCO may release call detail information by sending it to an address of record or,
 - b) by calling the customer at the telephone of record.
- 2) SELCO is required to provide mandatory password protection for online account access.
- 3) SELCO may provide CPNI to customers based on in-store contact with a valid photo ID.
- 4) SELCO must notify the customer immediately when a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed.
- 5) SELCO must establish a notification process for both law enforcement and customers in the event of a CPNI breach.
- 6) SELCO file with the Commission an annual certification, including an explanation of any actions taken against data brokers and a summary of all consumer complaints received in the previous year regarding the unauthorized release of CPNI.
- 7) The CPNI Regulations extend to providers of interconnected VoIP service.

Instructions to CSRs

Effective Friday, February 8, 2008 -

Call Detail Records (information on specific telephone calls placed or received by the customer, e.g. number called, date, time, location and duration of call) may only be disclosed:

- over the phone if the customer provides a pre-established password,
- via US Mail to the customer's address of record at the customer's request,
- via a call to the customer's telephone number of record,
- over the counter, if the customer presents a valid photo ID that matches the name on the account.

Note: You may also discuss specific call detail records over the phone on customer-initiated calls if they provide all of the call detail information necessary to address a customer service issue (i.e., the telephone number called, when it was called, and, if applicable, the amount charged for the call), however you may not disclose or discuss any other call detail information about the customer account other than the call detail information that the customer provides without the customer first providing a password.

New Password Procedures:

- 1) Customer Info Form
- 2) WinCable